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August 2, 2018

Freeman, et al. v. HSBC Holdings plc, et al.,
14-cv-06601-DLI-CLP

Dear Chief Judge Irizarry:

We represent Credit Suisse AG in the above-captioned matter. On September 14, 2016, the Moving Defendants¹ and Bank Saderat PLC (“Bank Saderat”) separately moved to dismiss Plaintiffs’ Second Amended Complaint. (Dkt. Nos. 119, 116.) On July 11, 2017, the Court entered an order referring the motions to dismiss to Magistrate Judge Pollak for the preparation of a Report and Recommendation. On July 27, 2018, Magistrate Judge Pollak issued a 135-page opinion, recommending that the Court deny the motions to dismiss. (Dkt. No. 165.) With consent of all defendants and the plaintiffs, we respectfully request an extension of time and enlargement of the page limitations for the submission of objections and responses to the Report and Recommendation. This is the first such request by any party.

Pursuant to Federal Rule of Civil Procedure 72(b), objections to the Report and Recommendation are due on August 10, 2018, and responses thereto are due on August 24, 2018. Given the length of the Report and Recommendation, the defendants propose, and the plaintiffs consent to, the following briefing schedule and page limitations:

¹ The “Moving Defendants” are HSBC Holdings plc, HSBC Bank plc, HSBC Bank Middle East Limited, HSBC Bank USA, N.A., Barclays Bank PLC, Standard Chartered Bank, the Royal Bank of Scotland N.V., Commerzbank AG and Credit Suisse AG.

Objections

- Objections to the Report and Recommendation shall be served by September 14, 2018.
- The Moving Defendants may submit joint objections not to exceed 35 pages. In addition, each of the Moving Defendants may submit individual objections not to exceed 5 pages each.
- Bank Saderat may submit individual objections not to exceed 25 pages.

Response

- Plaintiffs' omnibus response shall be served by October 24, 2018, and would be limited to the total number of pages of the combined objections of all defendants (inclusive of Bank Saderat).

Thank you for the Court's consideration.

Respectfully,

/s/ John D. Buretta
John D. Buretta

The Honorable Dora L. Irizarry
Chief United States District Judge
United States District Court
Eastern District of New York
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VIA ECF

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